

Exhibit D

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

In Re: Application of Tiger Moving, LLC)	Docket No. 2017-324-T
to Amend Class E (Household Goods))	
Certificate of Public Convenience)	
And Necessity No. 9801, along with a)	
Request to Amend Tariff)	

VERIFIED TESTIMONY OF JOE LEWIS

- 1 **Q. Please state your name, employer, and business address.**
- 2 A. My name is Joe Lewis. I am the Co-Owner and Managing Partner of Tiger Moving, LLC
- 3 (“Tiger Moving”). My business address is 899 North Main Street, Mauldin, South
- 4 Carolina 29662.
- 5 **Q. Are you over the age of 18, of sound mind, and swear that the testimony you give**
- 6 **today is based on your own personal knowledge?**
- 7 A. Yes.
- 8 **Q. Are there other partners in Tiger Moving?**
- 9 A. Yes. The other two partners in Tiger Moving are Steven Gammon and Kris Thompson.
- 10 **Q. What is Tiger Moving and how long has it been in business?**
- 11 A. Tiger Moving is a provider of household moving services. Tiger Moving obtained its
- 12 Class E (Household Goods) Certificate of Public Convenience and Necessity for
- 13 Operation of Commercial Vehicle Carrier on November 4, 2013, and has been operating
- 14 in the counties of Greenville, Spartanburg, and Anderson since that time.
- 15 **Q. In what state is Tiger Moving incorporated?**
- 16 A. Tiger Moving is incorporated in the State of South Carolina.

1 **Q. Is Tiger Moving authorized by the South Carolina Secretary of State to transact**
2 **business in South Carolina?**

3 A. Yes, a Certificate of Existence from the South Carolina Secretary of State is attached to
4 the Application we filed in this Docket.

5 **Q. How many employees does Tiger Moving have?**

6 A. Tiger Moving currently has 75 active employees, of which 35 are full-time.

7 **Q. If Tiger Moving is granted statewide authority, would it need to increase the**
8 **number of its employees?**

9 A. Yes, we anticipate needing to increase staffing.

10 **Q. How would Tiger Moving accomplish that increase to its workforce?**

11 A. If Tiger Moving is granted statewide authority, we do not anticipate it would be difficult
12 to obtain quality employees sufficient to support our expanded operations. Even though
13 Tiger Moving is not advertising it is hiring, we receive an abundance of applications from
14 people seeking employment with our company. In an average week, we receive as many
15 as five new applicants. Most of these potential employees have either seen our trucks on
16 the roads, have heard positive information about Tiger Moving, or have a friend or
17 contact who is an employee of Tiger Moving. If granted statewide authority, Tiger
18 Moving would advertise that it is hiring new employees, including in areas of the state
19 where we currently do not have employees.

20 **Q. How does Tiger Moving train its employees?**

21 A. Initially, I want to point out that Tiger Moving does not allow new hires to drive our
22 trucks until they have demonstrated they are reliable, dependable, team players who work
23 well with others, and capable of performing all fundamental requirements of the job,

1 including handling household good carefully. All new hires work for the company as
2 “New Hire Trainees” before being provided the opportunity to drive our trucks.
3 Additionally, we have a comprehensive new hire orientation process. Within one week of
4 being hired, and prior to working on a move, new hires are required to attend a
5 mandatory training meeting. In that meeting, a designated training manager introduces
6 new hires to topics that include, but are not limited to, warehouse/equipment; safety and
7 emergency protocols; company procedures and policies; fundamental lifting and moving
8 techniques; proper moving etiquette with respect to both customers and co-workers; and
9 our scheduling and communication software. After this mandatory training meeting,
10 Tiger Moving acquires each new hire’s availability to perform work, introduces the new
11 hires to the least strenuous, temporally short 4-person jobs, where they will have the
12 opportunity to learn “on-the-job” by working with and shadowing our more experienced
13 movers. During the performance of these jobs, new hires do not perform the more
14 complex tasks. Rather, those are performed by the more experienced movers on the
15 crew. Tiger Moving also emphasizes to all new hires that their primary focus during their
16 first 5-10 shifts must be safety; being careful; being polite and respectful to customer and
17 co-workers; shadowing and learning from the more experienced crew leaders and other
18 movers; asking questions; and only carrying lightweight, single-person items. During the
19 first 2-4 weeks of a new hire’s employment, our owners, managers, and schedulers
20 communicate very thoroughly with the new hire concerning overall performance. We
21 make sure to have this type of communication with new hires at the end of every move in
22 the form of a strength/weakness assessment. Once new hires prove they are capable of
23 confidently performing all requirements of 4-person jobs, we require that they receive 3

1 signatures from crew leaders confirming that the new hire is now fully capable of
2 working on more complex 2-person jobs. Also, within the first 2-4 months of
3 employment, our highest performing and most willing new hires are given the
4 opportunity to become Crew Leader Trainees for "Loading/Unloading Jobs," which are
5 jobs that do not require a truck. When Tiger Moving determines a given Crew Leader
6 Trainee is fit and willing to take on the tasks associated with leading these
7 "Loading/Unloading Jobs," we ensure the trainee is closely shadowed by an experienced
8 Crew Leader. In this circumstance, the Crew Leader Trainee is able, under the
9 supervision of the experienced Crew Leader, to fill out the contract with the customer,
10 explain the contract and insurance requirement to the customer, collect payment from the
11 customer, and make decisions required of Crew Leaders. Only after a Crew Leader
12 Trainee has thoroughly proven the ability to perform all crew leader job requirements
13 with confidence, will the Crew Leader will be eligible to become a Driver Trainee for the
14 company. The process of becoming a Driver usually takes 4-8 months from the date of
15 hiring, and 1-2 months from the point of becoming a Crew Leader Trainee, though the
16 time range varies based on the frequency of jobs worked and the overall ability and
17 eagerness to learn of the employee. Before promoting an employee to a Driver, Tiger
18 Moving performs a background check on the potential Driver's driving history. If the
19 history is satisfactory, Tiger Moving allows the Driver Trainee to drive the trucks in a
20 variety of scenarios with direct one-on-one instruction and supervision from the
21 company's Training Manager. Once a Driver Trainee passes a series of fundamental
22 tests, the Driver Trainee is given an opportunity to drive in a scenario involving a
23 customer job under direct supervision of another experienced Driver. After

1 approximately 2-4 weeks of close supervision, the Driver Trainee is permitted to
2 transition into a Driver.

3 **Q. Does Tiger Moving own or lease any vehicles?**

4 A. Yes, Tiger Moving owns all of the vehicles it uses in the transportation of household
5 goods. Tiger Moving's fleet consists of over 13 pieces of equipment consisting of seven
6 24-foot box trucks and six 26-foot box trucks.

7 **Q. Please describe the services Tiger Moving is seeking to provide in South Carolina?**

8 A. Tiger Moving currently provides household goods moving services in Greenville,
9 Spartanburg, and Anderson Counties. Through this Application, Tiger Moving is
10 applying for authority to transport household goods to any and all points within the State
11 of South Carolina. This includes packing, storage, and transporting of household goods.

12 **Q. Do you have experience providing these services?**

13 A. Yes. Tiger Moving has been providing household goods moving services since 2013.

14 **Q. Is Tiger Moving currently in good standing with the Public Services Commission**
15 **with respect to its transportation of household goods in its current three-county**
16 **territory?**

17 A. Yes.

18 **Q. Is Tiger Moving certified to provide intrastate transportation of household goods in**
19 **another state?**

20 A. No.

21 **Q. Has Tiger Moving ever been convicted of operating with no intrastate household**
22 **goods authority, or of failing to abide by the rules and regulations pertaining to the**
23 **intrastate transportation of household goods in this state or any other state?**

1 A. No.

2 **Q. Has Tiger Moving ever had a certificate authorizing the transportation of household**
3 **goods revoked in this state or any other state?**

4 A. No.

5 **Q. Are you aware of any complaint filed against Tiger Moving with the Better Business**
6 **Bureau, Chamber of Commerce, or any state or municipal court or agency, relating**
7 **to the quality of Tiger Moving's services?**

8 A. No, Tiger Moving is aware of no such complaints concerning the quality of the services
9 we provide.

10 **Q. Is Tiger Moving familiar with, and does it agree to comply with, the statutes and**
11 **regulations, including safety regulations and workers' compensation laws, that**
12 **govern for-hire motor carrier operations, and the operation of intrastate household**
13 **goods movers in South Carolina?**

14 A. Yes, Tiger Moving is familiar with the requirements and agrees to comply with them.

15 **Q. Why do you believe there is a need for Tiger Moving's services in South Carolina**
16 **beyond the current three-county territory where Tiger Moving currently operates?**

17 A. We frequently receive moving requests, primarily via telephone, from South Carolina
18 residents living outside of our current three-county territory. Without making any effort
19 to pursue business outside of Greenville, Spartanburg, and Anderson counties, we receive
20 roughly 3-5 requests weekly to perform moves outside those counties.

21 **Q. How will Tiger Moving market its services in South Carolina outside the current**
22 **three-county territory where Tiger Moving currently operates?**

1 A. We intend to advertise through social media, such as Facebook and Instagram; search
2 engine optimization services for our websites (targeting other densely populated regions
3 in South Carolina); handheld marketing materials, such as pamphlets and business cards);
4 and radio advertising. These are all marketing methods and techniques that we are
5 familiar with and that have been successful in our current geographic territory, and which
6 we would expand to seek business in an enlarged territory.

7 **Q. Is Tiger Moving financially able to provide the services for which it requests**
8 **authority?**

9 A. Yes. The Financial Statement that was included in Tiger Moving's Application
10 demonstrates that the Company is financially sound and able to provide the services for
11 which it seeks authorization.

12 **Q. Are there any outstanding court orders or judgment against Tiger Moving or you**
13 **personally?**

14 A. No.

15 **Q. Have any of Tiger Moving's drivers or vehicles been placed "out of service" by**
16 **Transport Police safety officers in the past twelve (12) months?**

17 A. No.

18 **Q. Is Tiger Moving aware of the Commission's insurance requirements and the**
19 **insurance premium costs associated therewith?**

20 A. Yes, Tiger Moving is aware of the Commission's insurance requirements and the
21 insurance premium costs associated therewith. Tiger Moving has insurance with respect
22 to its current operations in three counties. Tiger Moving also has attached to its
23 Application an insurance quote which meets the minimum insurance limits prescribed by

1 the Commission, and which is made by an insurance company authorized to do business
2 in South Carolina by the South Carolina Department of Insurance.

3 **Q. Does Tiger Moving have a proposed tariff?**

4 A. Yes. Along with its Application to expand its authority to statewide, Tiger Moving has
5 filed a Request to Amend Tariff. Tiger Moving's proposed amended Tariff was filed in
6 this Docket along with its Application.

7 **Q. Does Tiger Moving understand that the rates in that tariff would be the only rates
8 the Company could charge for intrastate moving of household goods?**

9 A. Yes.

10 **Q. How will Tiger Moving quote the cost of a move to a customer?**

11 A. We will continue quoting the cost of moves to customer via telephone and email. We
12 believe our current pricing system (hourly rate plus travel fee) will be suitable for
13 statewide moves.

14 **Q. Does Tiger Moving have a bill of lading?**

15 A. Yes. A copy of Tiger Moving's bill of lading is attached hereto as Exhibit A.

16 **Q. Will Tiger Moving provide a bill of lading for each move it conducts?**

17 A. Yes.

18 **Q. Does this conclude your testimony?**

19 A. Yes.

1 I declare, under penalty of perjury that the foregoing is true and correct.

2
3
4 Joe Lewis
5 Joe Lewis

6
7 Dated: 4 / 18 / 18
8
9

10
11 On this 18 of April, 2018, before me personally appeared Joe Lewis who
12 executed the foregoing instrument, and acknowledged that he executed the same as his free act
13 and deed.

14 IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in
15 the County and State aforesaid, the day and year first above written.

16
17 SWORN to and subscribed before me

18
19 this 18 day of April, 2018

20
21 Reyna M. Gonzalez (L.S.)
22 Notary Public for South Carolina

23
24 My Commission Expires: _____
25

